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RICHARD W. NAGEL
CLERK OF COURT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION - CINCINNATI

2024 NOV -6 PM 2: 34

U.S. DISTRICT COURT
SOUTHERN DIST OHIO
WEST DIV CINCINNATI

UNITED STATES OF AMERICA,
Plaintiff,

v.

MARK DRUMMOND,

Defendant.

CASE NO.

1:24CR 118

JUDGE

J. McFARLAND

INDICTMENT

18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1)

18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT 1

(Distributing Child Pornography)

On or about June 25, 2023, in the Southern District of Ohio and elsewhere, the defendant, **MARK DRUMMOND**, did knowingly distribute any child pornography, as defined in Title 18 United States Code Section 2256(8), to wit: image files by BitTorrent; using any means and facility of interstate and foreign commerce and that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18 United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNT 2

(Possession of Child Pornography)

On or about August 10, 2023, in the Southern District of Ohio, the defendant, **MARK DRUMMOND**, did knowingly possess a computer disk, and other material, to wit: a Samsung

Cellular Phone and a Xidax Computer that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18 United States Code, Sections 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

Upon conviction of any offense set forth in this Indictment, the defendant, **MARK DRUMMOND**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a): (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Title 18, United States Code, Chapter 110, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property, including but not limited to:

- a. A Samsung cellular phone with IMEI: 352252552801210; and
- b. A XIDAX Computer Tower with serial number: 1706290159710023, with single internal drive of a Western Digital Blue 1 TB with serial number WCC6Y3NDF3N3.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b), to seek forfeiture of any other property of the defendant, up to the value of the property described above.

A TRUE BILL

/s/
GRAND JURY FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**


**KYLE J. HEALEY
ASSISTANT UNITED STATES ATTORNEY**